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EXHIBIT A
PROPOSED ORDER

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(Ret.), Trustee of the PG&E Fire Victim Trust

7
8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

10 **In re:**
11 **PG&E CORPORATION**
12 **-and-**
13 **PACIFIC GAS AND ELECTRIC**
14 **COMPANY,**
15 **Debtors.**

- 16 ☐ Affects PG&E Corporation
17 ☐ Affects Pacific Gas and Electric Company
18 ☒ Affects both Debtors

19 **All papers shall be filed in the Lead Case,*
20 *No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**[PROPOSED] ORDER COMPELLING
PRICEWATERHOUSECOOPERS LLP'S
COMPLIANCE WITH RULE 2004
SUBPOENA IN RELATION TO THE
GENERAL RATE CASE DOCUMENTS**

1 The Court has reviewed all proposed orders and related correspondence submitted by the
2 parties. This Court has determined that there is just cause for compelling PwC's compliance and
3 orders as follows:

4 1. Within twenty-one (21) days of the date of this Order, unless otherwise agreed by
5 the Trustee and to the extent such materials have not already been produced by PwC, PwC shall
6 produce to the Trustee all documents and information described at No. 5 of the Trustee's status
7 report of August 2, 2021: PwC's deliverables relating to the General Rate Case ("GRC"), meaning
8 PwC's work product generated in connection with that engagement, including advice,
9 recommendations, analysis, and/or reports to PG&E, during the time period 2013 through March 17,
10 2020.

11 2. In the event that PwC withholds any of the above-described documents based on a
12 claim of attorney-client privilege, work-product protection, or any other privilege, whether such
13 privilege is asserted by PG&E or PwC, PwC shall provide a privilege log to the Trustee within
14 twenty-eight (28) days of the date of this Order, unless otherwise agreed by the Trustee, identifying,
15 as demanded by the subpoena: (a) the type, title and subject matter of the Document; (b) the place,
16 date, and manner of preparation of the Document; (c) all authors, addressees, and recipients of the
17 Document, including information about such persons to assess the privilege asserted; and (d) the
18 legal privilege(s) and the factual basis for the claim.

19 3. This Order is without prejudice to the Trustee's right to seek additional examinations
20 or documents pursuant to Bankruptcy Rule 2004 or any other applicable law.

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22 ** END OF ORDER **
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